

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ALTHEA FORBES,

Plaintiff,

v.

**PORTFOLIO RECOVERY
ASSOCIATES, LLC,**

Defendant.

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CASE NO. 2:20-cv-1331

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant Portfolio Recovery Associates, LLC hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Allegheny County, Pennsylvania and in support thereof avers as follows:

1. Portfolio Recovery Associates, LLC is a defendant in a civil action originally commenced by Praeipce for Writ of Summons on or about April 16, 2020 in the Court of Common Pleas of Allegheny County, Pennsylvania titled *Althea Forbes v. Portfolio Recovery Associates, LLC* and docketed to Case No. GD-20-005130.

2. Plaintiff filed her Complaint on July 17, 2020.

3. The removal is timely under 28 U.S.C. § 1446(b). PRA received service of Plaintiff's Complaint by certified mail on August 7, 2020.

4. Pursuant to 28 U.S.C. § 1446, attached here as Exhibit A are copies of all process, pleadings, and orders filed in the state court action.

5. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against PRA alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

6. On this date, PRA has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Allegheny County, Pennsylvania.

WHEREFORE, Defendant Portfolio Recovery Associates, LLC respectfully removes this case to the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER, LTD.

By: /s/ Lauren M. Burnette
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Counsel for Defendant

Dated: September 8, 2020

CERTIFICATE OF SERVICE

I certify that on September 8, 2020, a true copy of the foregoing document was served as follows:

Via Email and U.S. Mail, Postage Prepaid

Joshua P. Ward, Esq.
Kyle Steenland, Esq.
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Counsel for Plaintiff

Via Electronic Filing

Court of Common Pleas
Allegheny County
414 Grant St.
Pittsburgh, PA 15219

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Dated: September 8, 2020